

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

THOMAS SIERRA,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	
	)	
REYNALDO GUEVARA, ERNEST	)	Case No. 18-cv-3029
HALVORSEN, ANTHONY WOJCIK, JOHN	)	
McMURRAY, GEORGE FIGUEROA,	)	
EDWARD MINGEY, ROBERT BIEBEL,	)	Hon. John Z. Lee
FRANCIS CAPPITELLI, UNKNOWN	)	
EMPLOYEES OF THE CITY OF CHICAGO,	)	Magistrate M. David Weisman
and the CITY OF CHICAGO, ILLINOIS,	)	
	)	
<i>Defendants.</i>	)	

**DEFENDANT CITY OF CHICAGO’S UNOPPOSED MOTION FOR EXTENSION TO  
FILE RESPONSE BRIEF**

Defendant City of Chicago (“the City”), by and through its undersigned attorneys, requests additional time to file its response to Plaintiff’s Motion to Compel Production of *Monell* Homicide Files Without Improper Redactions. (Dkt. 253).

1. On April 13, 2021, Plaintiff filed his Motion to Compel Production of *Monell* Homicide Files Without Improper Redactions (Dkt. 253).

2. The following day, this Court entered an order directing the City to file its response to Plaintiff’s Motion by April 28, 2021 and directing Plaintiff to file his reply by May 5, 2021. (Dkt. 258). Plaintiff’s motion addresses the redactions in the City’s production for nearly 100 files.

3. Since Plaintiff filed this motion, counsel for the City has been engaged in multiple day-long depositions across several cases, among other personal and professional obligations.

4. Given these circumstances, additional time is needed for the City to respond to Plaintiff's motion to compel. For this reason, the City respectfully requests an additional week, until May 4, 2021, to file its response.

5. This brief extension will not cause any undue delay or prejudice to any party. Discovery in this case is ongoing, and this short extension on this issue will not hinder that progress.

6. The City's counsel has conferred with Plaintiff's counsel, who does not object to this motion.

WHEREFORE, Defendant City of Chicago, requests this Honorable Court grant its Motion for Extension of Time to file its Response to Plaintiff's Motion to Compel to May 4, 2021 and for any other relief as this court deems just and reasonable.

Dated: April 28, 2021

Respectfully submitted,

CELIA MEZA

Acting Corporation Counsel for the City of  
Chicago

By: /s/ Catherine M. Barber  
One of its attorneys

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